

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

EXPLORICA, INC.

Plaintiffs,

v.

ELDERHOSTEL, INC.
d/b/a EXPLORITAS,

Defendants.

Civil Action No. 09-11719-RGS

ELDERHOSTEL'S PROPOSED VOIR DIRE QUESTIONS

Pursuant to the Court's Order dated January 26, 2010, Elderhostel proposes the following questions for voir dire.

1. The potential witnesses in this case include:
Olle Olsson
Marc Mann
Stephane Cosse
Alexa Poulin
Kestrel Dunn
Birgitta Zissis
James Moses
Peter Spiers
JoAnn Bell
Steven Smith
Julia Huston
Arthur Frommer
Nancy Nordstrom
2. Do you know any of the potential witnesses in this case?
3. Do you know any of the attorneys in this case?
4. Do you know any employees of the parties in this case, Elderhostel, Inc. or Explorica, Inc.?
5. Do you, any of your family members, or close friends work in the travel industry?

6. Do you, any of your family members, or close friends work in a field relating to senior citizens?
7. Do you, any of your family members, or close friends work for a grammar school, middle school, or high school?
8. Do you, any of your family members, or close friends work for a law firm, attorney, judge, court, or law enforcement agency?
9. Do you, any family members or close friends own, manage or operate a business?
10. Have you, any family member or close friends been involved in a civil case, other than a divorce, as a witness, or a defendant?
11. Have you previously served as a juror:
 - In a civil case
 - In a criminal case
 - On a grand jury
12. Do you or any member of your immediate family have any strong feelings concerning the civil justice system people who file or defend lawsuits?
13. Do you or any member of your immediate family or close friends have any special knowledge, education or interest in any of the following:
 - Law
 - Trademark law
 - Intellectual property law
 - Psychology
 - Economics
 - Finance or accounting
 - Statistics
14. Do you have strong feelings about trademark law or protection of intellectual property?
15. Based on what you know about this case, do you feel that anything about your life experience would prevent you from being a fair and impartial juror in this case?

Respectfully submitted,

ELDERHOSTEL, INC.

By its attorneys,

Dated: February 8, 2010

/s/ Michael A. Albert
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CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Michael A. Albert